

**Comments Pertaining to the May 15, 2018 Standard Operating Procedures (SOPs)
for the Ongoing 2016 Residential Drinking-Water Well Surveying and Sampling Program
Chemours Chambers Works**

General Comments

Contact with the Homeowner/Tenant/Renter: The SOPs focus on contact with the homeowner. However, if the owner of a rental property is not responsive then attempts should be made to contact the tenant or renter directly, especially for situations where an alternate potable water source (e.g., bottled water, treatment system, etc.) is to be offered. Furthermore, the SOPs should address the situation of tenants or renters requesting, independent of the homeowner, an alternate potable water source.

If at any time a homeowner/tenant/renter ceases contact, the information regarding the homeowner/tenant/renter and the property should be included in the “non-response” list and remain there until contact is reestablished.

Procedures for Discontinuing an Alternate Water Source: Please provide the procedures that will be used to determine when an alternate source of water is no longer necessary.

Screening Criteria: The SOPs should include provisions for updating the criteria, to ensure that the currently accepted criteria are used to evaluate drinking-water results. If the screening criteria changes, prior sampling results should be evaluated to determine if there are wells that previously did not qualify for an alternate source of water but now (using the updated criteria) qualify.

Analytical Methods: The most current method should be used to analyze the drinking-water samples. To-date this is Method 537.1, for 18 PFAS compounds. The SOPs should include a provision for updating the analytical method as appropriate.

Please confirm the reporting level that will be attained for the analyses performed under the SOPs.

Analytical Results Reporting to Government Agencies: The SOPs should include a section listing the relevant municipal, state, and federal contacts, and the specific information that each contact will receive.

Properties in Foreclosure/Lender-Owned: For situations where a property is in foreclosure or lender-owned, the property tax and sale records should be reviewed quarterly (or visit the property during quarterly operation and maintenance monitoring) to determine if the property has

been transferred to a new owner. If the property has been transferred, then the new owner should be contacted to ascertain the well's status.

Denial of Access for Sampling: If a property owner denies access for sampling, we recommend that the property tax and sale records be reviewed annually to determine if the property has been transferred to a new owner. If the property has been transferred, then the new owner should be contacted to discuss the need for sampling.

Specific Comments

Section 1.0 – Introduction: The second footnote on Page 1 states that, starting in 3Q18, annual resampling for two additional years will be offered to homeowners whose 2009 PFAS results fall between 2 parts per trillion (ppt) and 5 ppt. Annual sampling of wells with any detections should be ongoing (beyond the two additional years) until it can be shown that the frequency can be modified (for further explanation, please see our comment on Section 3.0, below).

Section 2.0 – Development of Homeowner Contact List through Issuing of the Result Letters: Instead of limiting the period to two additional years, Chemours should continue to annually attempt to contact homeowners that are designated “non-response” (i.e., the recipient received the letter/s but did not call back or respond to Chemours).

A procedure should be developed for ensuring that Chemours is aware of any new development occurring within the PFAS-impacted areas, and that steps are taken to ensure that the new development is not using PFAS-contaminated water as a source of potable water.

The text on Page 4 explains that samples are typically shipped to the laboratory on Tuesdays (to ensure receipt by the laboratory on a weekday). Please explain how sample custody/preservation is maintained, and whether there is a potential issue with exceeding sample holding times.

Section 3.0 – Drinking-Water Wells Not Qualified for Treatment: As stated in our comment on Section 1.0, annual sampling of wells should be ongoing (beyond the two additional years) until it can be shown that the frequency can be modified. For example, if the results for two consecutive years are below the screening criteria but still detected, then annual sampling should continue until there are two consecutive years of non-detects. After that the wells can be placed on a modified (case-specific) frequency.

The SOPs should include procedures for responding to situations where unusual or unexpected sampling results are encountered, such as finding a single homeowner with PFAS not detected or detected below screening criteria, in a community where the other results are above criteria.

Section 4.0 – Treatment Offer for Qualified Drinking-Water Wells through Completed Treatment Implementation: The last sentence on Page 8 states that the temporary provision of bottled water may be a “semi-permanent treatment option”. Please explain the meaning of this term.

Section 5.0 – Routine Quarterly OM&M for GAC Treatment Systems: Step 2 (on Page 12) should include a provision for reminding the homeowner/tenant not to touch or otherwise adjust the system.

For Step 3, please explain if there any possibility that the holding time for the BED2 sample could be exceeded and the steps to be taken if this occurs.

We would like to discuss with Chemours modifying the OM&M program to routinely analyze the BED2 sample.

For Step 4, carbon change out is to be performed if certain BED2 concentration criteria are met. Change out should occur if any BED2 concentrations of PFAS are detected.

Figures 1 and 2: These figures should be revised, as necessary, based on the aforementioned comments.

Appendices A, B, and C (Letters to Well Owners): We propose coordinating with Chemours to simplify the letters, in order to make them easier for the public to understand.

For situations where a letter is sent to an address that is not the well location address, please include the well location address in the letter’s subject line.